

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

Case No. 22-11150-GG
L.T. Case No. 9:18-cv-80176-BB

IRA KLEIMAN, as the Personal Representative of the Estate of David Kleiman,
Plaintiff-Appellant,

v.

CRAIG WRIGHT,
Defendant-Appellee.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
APPELLEE'S BRIEF**

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**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Eleventh Circuit Rule 26.1, Appellee Dr. Craig Wright (“Dr. Wright”), respectfully submits the following Certificate of Interested Parties and Corporate Disclosure Statement:

1. The Honorable Judge Beth Bloom, *U.S. District Judge*
2. Boies Schiller Flexner LLP, *Counsel for Plaintiff-Appellant*
3. Brenner, Andrew, *Counsel for Plaintiff-Appellant*
4. BTCN 1610-491 LLC (CE)
5. Delich, Joseph, *Counsel for Plaintiff-Appellant*
6. Devine Goodman & Rasco, LLP, *Counsel for non-party Andrew O'Hagan*
7. Economides, Constantine Philip *Counsel for Plaintiff-Appellant*
8. Estate of David Kleiman, *Plaintiff-Appellant*
9. Fernandez, Amanda Lara, *Counsel for Defendant-Appellee*
10. Fernandez, Michael Alexander, *Counsel for Defendant-Appellee*
11. Freedman, Velvel, *Counsel for Plaintiff-Appellant*
12. Glaser, Patricia, *Counsel for non-party John Doe*
13. Glaser Weil Fink Howard Avchen & Shapiro LLP, *Counsel for nonparty John Doe*
14. Harrison, Laselve, *Counsel for Plaintiff-Appellant*

15. Henry, Allison, *Counsel for Defendant-Appellee*
16. *Holtzman, Alexander, *Counsel for Plaintiff-Appellant*
17. Kass, Zalman, *Counsel for Defendant-Appellee*
18. Kleiman, Ira, *Plaintiff-Appellant*
19. Kuntz, Robert, *Counsel for Defendant-Appellee*
20. Lagos, Stephen, *Counsel for Plaintiff-Appellant*
21. Licata, Samantha, *Counsel for Plaintiff-Appellant*
22. *Lohr, Whitney, *Counsel for Defendant-Appellee*
23. *Markoe, Zaharah, *Counsel for Defendant-Appellee*
24. McGovern, Amanda *Counsel for Defendant-Appellee*
25. Mestre, Jorge, *Counsel for Defendant-Appellee*
26. Payne, Darrell Winston, *Counsel for non-party John Doe*
27. Pritt, Maxwell, *Counsel for Plaintiff-Appellant*
28. Rasco, Guy Austin, *Counsel for non-party Andrew O'Hagan*
29. The Honorable Judge Bruce Reinhart, *U.S. District Magistrate Judge*
30. Rivero, Andres, *Counsel for Defendant-Appellee*
31. Rivero Mestre LLP, *Counsel for Defendant-Appellee*
32. Roche Freedman LLP, *Counsel for Plaintiff-Appellant*
33. Roche, Kyle, *Counsel for Plaintiff-Appellant*
34. Rolnick, Alan, *Counsel for Defendant-Appellee*

35. Stearns Weaver Miller Weissler Alhadoff & Sitterson, P.A., *Counsel*

for non-party John Doe

36. Wright, Craig, *Defendant-Appellee*

37. Zack, Stephen, *Counsel for Plaintiff-Appellant*

* = no longer involved in representation

Appellee certifies that no other judges, attorneys, persons, associations of persons, firms, partnerships, or corporations have an interest in the outcome of this appeal.

1. Pursuant to Eleventh Circuit Rule 31-2(d), Appellee respectfully moves for a 60-day extension of time, through November 25, 2022, to file the responsive brief in this matter. Appellant does not oppose the requested extension.

2. On May 13, 2022, the Court granted Appellant's first motion for an extension to time, providing an additional 60 days to file its initial brief.

3. On July 7, 2022, Appellant filed a second motion for extension of time seeking an additional 30 days. Appellee did not oppose and the Court granted the second motion on July 13, 2022.

4. Appellant filed its initial brief on August 17, 2022.

5. Appellant sought and was granted leave to correct and amend its initial brief on August 26, 2022, and filed such a brief on the same day.

6. Appellee's brief is currently due on September 26, 2022.

7. While Appellee has been working diligently to review the voluminous record and prepare his responsive brief, Appellee's counsel is involved in numerous cases that are extremely active at this time. Among other tasks, counsel will be meeting impending deadlines in two MDL cases and preparing an opening brief for a separate appeal before this Court. Those obligations and the press of other litigation compel Appellee to respectfully request a 60-day extension to ensure sufficient time to adequately address the issues presented in this appeal in a thoughtful and thorough brief that is useful to the Court.

8. This extension is requested in good faith and is not sought for purposes of delay. Moreover, no party will be prejudiced by the requested extension.

In accordance with 11th Cir. R. 26-1, Appellee's counsel has conferred with counsel for Appellant regarding this motion, and Appellant does not oppose the requested extension.

WHEREFORE, for the forgoing reasons, Appellee respectfully requests the Court extend the time in which to file the response brief by 60-days, until and including November 25, 2022.

Date: August 31, 2022.

Respectfully submitted,

By: s/ Andres Rivero
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CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A) because it contains 319 words. This motion also complies with typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using Microsoft Word Office Version 2013 and 14-point Times New Roman type style.

/s/ Andres Rivero

CERTIFICATE OF SERVICE

I CERTIFY that on August 31, 2022, I electronically filed this document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Andres Rivero